

July 14, 1992

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Ms. Donna R. Searcy
Secretary
Federal Communications Commission
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

RE: RM No. 8013

Dear Ms. Searcy:

I am writing on behalf of Amtech Logistics Corporation ("ALC") in opposition to a petition for rule making recently filed by PacTel Teletrac with the Federal Communications Commission. The rules PacTel seeks to change pertain to automatic vehicle monitoring systems. For the reasons noted herein, we oppose the petition for rule making.

ALC is a privately held corporation. Shareholders include domestic and international transportation companies, including several Class One U.S. railroads. A minority interest is held by Amtech Corporation.

ALC has created and manages a system of automated, world-wide tracking of transportation equipment including intermodal freight containers, chassis, rail cars and trucks using automated equipment identification (AEI) technology. Since early 1991, ALC has been providing seamless tracking services for international intermodal carriers and their customers. Participants in this service include American President Companies, Ltd., Chicago and North Western Railroad, Consolidated Rail Corporation, Norfolk Southern Railroad and Union Pacific Railroad. The current ALC network links AEI carrier owned read points in Asia with over thirty such read points in the United States. The US points are located in ports in California and Washington and at wayside rail locations across the country.

Tracking of transportation equipment is accomplished by reading AEI transponders affixed to such equipment and reporting the date, time and location and direction of movement of the equipment to ALC's carrier customers. The AEI transponders operate within the 902-928 MHz portion of the frequency spectrum and comply with international and domestic standards established by the International Standards Organization ("ISO") (ISO 10374), the American National Standards Institute ("ANSI") (standard MH5.1.9-1990), the Association of American of Railroads ("AAR") (standard S-918), and the American Trucking Associations ("ATA").

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As the petition by PacTel would restrict the use of the spectrum used by ALC and its carrier customers, we find it curious that this fact was not mentioned by PacTel in their petition. In view of the significant activity over the last two years in establishing the standards referred to above, it would seem that PacTel should have been aware of the current and planned use of the spectrum by the transportation industry.

It is our understanding that if the PacTel petition were granted, it would have the effect of granting exclusive future use of the 904-912 MHz and the 918-926 MHz portion of the spectrum to PacTel and similar users. We oppose the PacTel request for exclusive use of this spectrum because:

- 1) It would deny use of this portion of the spectrum to our carrier customers, limit their implementation of AEI, and thereby severely restrict our ability to provide them with transportation equipment tracking services based on AEI technology;
- 2) It would interfere with the effective implementation of the national and international standards noted above with respect to the identification of domestic and international transportation equipment and its movement; and
- 3) It is contrary to the public interest in shared use of the radio spectrum.

As noted above, the services we provide are dependent upon the implementation of AEI technology by domestic and international water, rail and motor carriers. Our services allow our carrier customers to track, in a timely and accurate manner, the movement of their transportation equipment and the goods they convey. This tracking capability allows carriers to substantially improve services to their customers while generating savings through more effective management of transportation assets. "Grandfathering" our carrier customer's existing uses of the spectrum as proposed by PacTel would severely limit our ability to provide tracking services.

The standards referred to above are compatible with one another and provide the opportunity for a seamless tracking system for the movement of transportation equipment throughout the world, whether such units move by rail, truck or ship.

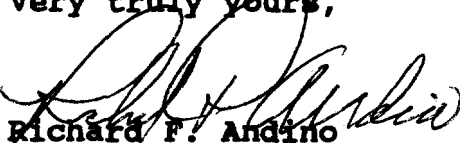
As the standards designate 902-928 MHz as the frequency and as our carrier customers require a number of different frequencies at the same location, such as an inland or marine terminal, granting exclusive use of a broad portion of the 902-928 MHz spectrum to PacTel would clearly interfere with their ability to comply with the standards.

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Finally, we oppose the PacTel petition because we believe granting it would not be in the public interest. Operation of the 902-928 MHz spectrum has historically been on a shared basis. Such shared use encourages the development of multiple competitive products in response to the needs of the marketplace. PacTel's attempt to limit its competitors by seeking exclusive use of a broad portion of the spectrum would result in substantial detriment to ALC, a new company providing tracking services to major domestic and international carriers. Excluding ALC's carrier customers from a substantial portion of the spectrum for the benefit of a single entity or class of entities would appear to be contrary to public policy.

In summary, we oppose the PacTel petition for the reasons enumerated herein. We request that the FCC deny PacTel's request and allow ALC and its carrier customers to continue to utilize the 902-928 MHz spectrum that is currently available for AEI applications.

Very truly yours,


Richard F. Andino
Vice President

RFA/kjb